

EXHIBIT A

(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>WOODBIDGE GROUP OF COMPANIES, LLC, <i>et. al.</i>,</p> <p style="text-align: center;">Remaining Debtors.¹</p>	<p>Chapter 11</p> <p>Case No. 17-12560 (BLS)</p> <p>(Jointly Administered)</p>
<p>MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of WOODBRIDGE GROUP OF COMPANIES, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ASPEN GLEN, INC.; CLUBCORP HOLDINGS, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Proc. No: 19-50858 (BLS)</p>

**ORDER APPROVING EIGHTH STIPULATION REGARDING DATE FOR TRUSTEE
TO FILE FURTHER AMENDED COMPLAINT AND DATE FOR DEFENDANT TO
ANSWER, MOVE OR OTHERWISE
RESPOND TO FURTHER AMENDED COMPLAINT**

This Court having considered the *Eighth Stipulation Regarding Date for Trustee to File Further Amended Complaint and Date for Defendant to Answer, Move or Otherwise Respond to Further Amended Complaint* (the “Eighth Stipulation”)² between ClubCorp Holdings, Inc. (“ClubCorp”) and Michael Goldberg, as Liquidating Trustee of the Woodbridge Liquidation

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed in the Certification of Counsel filed with the Stipulation.

Trust, successor in interest to the estates of Woodbridge Group of Companies, LLC, *et al.* (the “Trustee”) attached hereto as Exhibit 1; the Court having determined that good and adequate cause exists for approval of the Eighth Stipulation; and the Court having determined that no further notice of the Eighth Stipulation must be given; it is hereby

ORDERED that the Eighth Stipulation is approved.

ORDERED that (a) the Trustee shall be permitted to file a further amended complaint (the “Further Amended Complaint”) in the above-captioned adversary proceeding (the “Adversary Proceeding”), provided he does so on or before 30 days from the date of this Order, and (b) ClubCorp shall have 30 days from the date of the Trustee’s filing and service of the Further Amended Complaint to answer, move or otherwise respond to the Further Amended Complaint.

EXHIBIT 1

(Eighth Stipulation)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<p>In re:</p> <p>WOODBIDGE GROUP OF COMPANIES, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Remaining Debtors.¹</p>	<p>Chapter 11</p> <p>Case No. 17-12560 (BLS)</p> <p>(Jointly Administered)</p>
<p>MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of WOODBRIDGE GROUP OF COMPANIES, LLC, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ASPEN GLEN, INC.; CLUBCORP HOLDINGS, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Proc. No: 19-50858 (BLS)</p>

**EIGHTH STIPULATION REGARDING DATE FOR TRUSTEE TO FILE FURTHER
AMENDED COMPLAINT AND DATE FOR DEFENDANT TO ANSWER, MOVE OR
OTHERWISE RESPOND TO FURTHER AMENDED COMPLAINT**

Michael Goldberg, in his capacity as the Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of Woodbridge Group of Companies, LLC, *et al.*, (the “Trustee”) and ClubCorp Holdings, Inc. (“ClubCorp” together with Plaintiff, the “Parties”), enter into this *Eighth Stipulation Regarding Date for Trustee to File Further*

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard, #302, Sherman Oaks, California 91423.

Amended Complaint and Date for Defendant to Answer, Move or Otherwise Respond to Further Amended Complaint (the “Eighth Stipulation”)² and hereby stipulate and agree as follows:

1. ClubCorp was served with the Summons issued on December 4, 2019, and the Complaint, which service and venue is not disputed.

2. The Trustee shall be permitted to file a further amended complaint (the “Further Amended Complaint”) in the above-captioned adversary proceeding (the “Adversary Proceeding”) provided he does so on or before 30 days from the date of the Court’s order approving this Eighth Stipulation

3. ClubCorp shall have 30 days from the date of the Trustee’s filing and service of the Further Amended Complaint to answer, move or otherwise respond to the Further Amended Complaint.

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² Capitalized terms not otherwise defined herein shall have the meaning ascribed in the Certification of Counsel filed with the Stipulation.

4. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

<p>Dated: July 29, 2020</p> <p>PACHULSKI STANG ZIEHL YOUNG & JONES LLP</p> <p><u>/s/ Colin R. Robinson</u> Andrew W. Caine (CA Bar No. 110345) Bradford J. Sandler (DE Bar No. 4142) Colin R. Robinson (DE Bar no. 5524) 919 North Market Street, 17th Floor P.O. Box 8705 Wilmington, DE 19899 (Courier 19801) Phone: (302) 652-4100 Email: acaine@pszjlaw.com bsandler@pszjlaw.com crobinson@pszjlaw.com</p> <p><i>Counsel for Michael Goldberg, in his capacity as the Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estates of Woodbridge Group of Companies, LLC, et al.</i></p>	<p>Dated: July 29, 2020</p> <p>ASHBY & GEDDES, P.A.</p> <p><u>/s/ Benjamin W. Keenan</u> Ricardo Palacio (No. 3765) Benjamin W. Keenan (No. 4724) P.O. Box 1150 Wilmington, Delaware 19899 Phone: (302) 654-1888 Email: bkeenan@ashbygeddes.com</p> <p><i>-and-</i></p> <p>TAFT STETTINIUS & HOLLISTER LLP John R. McDonald Karl J. Johnson 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402 Phone: 612-977-8400 Email: JMcDonald@Taftlaw.com Kjohnson@Taftlaw.com</p> <p><i>Counsel for ClubCorp Holdings, Inc.</i></p>
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